

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case No. 22-40 (JRT/LIB)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**GOVERNMENT’S MOTION
FOR EXTENTION OF TIME
TO FILE SENTENCING
POSITIONS**

(1) 1. HARSHKUMAR RAMANLAL
PATEL

a/k/a “Dirty Harry,”

a/k/a Harry Patel,

a/k/a Param Singh,

a/k/a Haresh Rameshlal Patel,

a/k/a Harshkumar Singh Patel, and

2. STEVE ANTHONY SHAND,

Defendants.

The United States of America, by and through its attorneys, Lisa D. Kirkpatrick, Acting United States Attorney for the District of Minnesota, and Michael McBride, Assistant United States Attorney, hereby moves the Court for an order extending the time for filing sentencing positions until two weeks before the sentencing hearings.

Currently, sentencing positions are due on April 1, 2025. Both Government Counsel are preparing for trial in unrelated cases and require additional time to draft thorough sentencing positions. The undersigned has

conferred with counsel for both defendants. They do not object to extending the time for filing until two weeks before the sentencing hearings.

Dated: March 31, 2025

Respectfully Submitted,

LISA D. KIRKPATRICK
Acting United States Attorney

s/ Michael P. McBride
BY: MICHAEL P. MCBRIDE
Assistant United States Attorney

RYAN LIPES
Trial Attorney